

**IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA,

v.

RAYSHUN JACKSON

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CASE NO. 3:21-CR-00226-M

**DEFENDANT’S MOTION FOR CONTINUANCE OF
CHECK-IN DATE**

Defendant Rayshun Jackson (“Mr. Jackson”), by counsel, moves this Court to continue his check-in date for family medical reasons.

On August 16, 2022, Mr. Jackson was sentenced to serve a term of sixty (60) months at FPC Montgomery and was ordered to surrender for service of sentence at the institution before 2:00 p.m. October 18, 2022 [Dkt. 71].

Mr. Jackson noticed the Court on August 15, 2022 [Dkt. 67] that his mother had been placed on Hospice care. Mr. Jackson received a letter from Hospice Plus, the agency which his mother is placed on Hospice services with (*see Exhibit 1*). As detailed in the letter, Mr. Jackson’s mother’s condition is not expected to improve, and her health continues to decline. Their “team is unable to predict when our patient will pass away of course, but it could occur within the next 30 to 60 days.”

The postponement of the check-in date will provide Mr. Jackson the opportunity to continue as one of his mother’s primary care-givers and also will allow him to be present for her passing.

WHEREFORE, for the reasons set forth above, Mr. Jackson respectfully requests that the foregoing Motion to Continue Check-In Date be granted, and that his surrender date for service of

sentence at FPC Montgomery be rescheduled from the current setting to any date that the Court deems appropriate.

Dated: October 10, 2022

Respectfully submitted,

/s/ Brandon N. McCarthy

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ATTORNEYS FOR DEFENDANT,
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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing was served on all parties and counsel of record via the Court's CM/ECF system on this 10th day of October, 2022.

/s/ Brandon N. McCarthy

Brandon N. McCarthy

CERTIFICATE OF CONFERENCE

The undersigned certifies that defense counsel has attempted to confer with the Assistant United States Attorney and they have not yet responded. As such, and to prevent further delay in filing of this motion, the undersigned defense counsel is filing as is.

/s/ Barrett R. Howell
Barrett R. Howell